

Neptune LNG LLC
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December 19, 2022

Robert Burrough
Director, Eastern Region
Pipeline and Hazardous Materials Safety Administration
840 Bear Tavern Road, Suite 300
West Trenton, NJ 08628
Via Overnight / FedEx
609-771-7800

**Re: Neptune LNG Proposed Amended Procedures
CPF 1-2022-048-NOA**

Dear Director Burrough:

In accordance with that certain August 18, 2022 Notice of Amendment ("NOA") issued by the Pipeline and Hazardous Materials Safety Administration ("PHMSA") in the above-referenced proceeding, and PHMSA's September 29, 2022 response to the request for additional time to respond submitted by Neptune LNG LLC ("Neptune LNG"), Neptune LNG hereby submits the attached proposed amended provisions. These amendments, made to Appendix J of Neptune LNG's Deepwater Port Operations Manual ("Appendix J"), are submitted to address those Neptune LNG procedures found by PHMSA not to be compliant with the Pipeline Safety Regulations in Title 49 of the Code of Federal Regulations ("CFR"). These findings were the result of a PHMSA inspection conducted in June 2021 and are described below in the same sequence set forth in the NOA.

As requested, a copy of these materials is being submitted on the included flash drive.

1, **Notice of Changes to PHMSA – 49 CFR 191.22**

PHMSA concluded that Neptune LNG's Appendix J failed to include an itemization of the types of activities or events in which PHMSA must be notified and the time frame for such notification, such as changes in entity or an acquisition or divestiture.

Neptune LNG has made updates to Item 7 of the Reporting Procedures in Appendix J to respond to these concerns.

2. **Abandonment and Deactivation of Pipelines and Facilities – 49 CFR 192.727**

PHMSA concluded that Neptune LNG's Appendix J failed to detail a process for the abandonment and deactivation of pipelines and facilities, such as how to file a report, who must file the report and when it must be filed and how to submit mapped facilities to the National Pipeline Mapping System.

Neptune LNG has made updates to Item 1 of the Abandonment and Deactivation Procedures in Appendix J to respond to these concerns.

3. **Process for Determining MAOP – 49 CFR 192.619**

PHMSA concluded that Neptune LNG's Appendix J failed to include sufficient detail regarding a process for determining the Maximum Allowable Operating Pressure ("MAOP") of a pipeline segment, such as conditions that may limit MAOP.

Neptune LNG has made updates to Item 1 of the MAOP Procedures in Appendix J to respond to these concerns.

4. **Field Repair Procedures for Submerged Pipeline Facilities – 49 CFR 192.717**

PHMSA concluded that Neptune LNG's Appendix J failed to include sufficient details regarding making field permanent field repairs of leaks on transmission lines.

Neptune LNG has made updates to Item 3 of the Field Repair Procedures in Appendix J and the Appendix F to Appendix J to respond to these concerns.

5. **Process for Purging Pipelines – 49 CFR 192.629**

PHMSA concluded that Neptune LNG's Appendix J failed to include a detailed process that describes how to purge the pipeline when it is removed from and placed back into service, such as among other things, identifying the location of purge points, use of critical valves to control flow, measured levels of gas in air or inter medium mixtures, and the calculation of times needed to assure purge.

Neptune LNG has made updates to Item 1 of the Pipeline Purging Procedures in Appendix J and included a new Appendix E to Appendix J to respond to these concerns.

6. **Corrosion Control and Cathodic Protection Systems – 49 CFR 192.453**

PHMSA concluded that Neptune LNG's Appendix J failed to include a detailed process regarding the design, installation, operation and maintenance of cathodic protection systems and the qualifications defining who may perform such tasks and documentation needed to substantiate qualification.

Neptune LNG has made updates to Item 1 of the Corrosion Control Procedures in Appendix J to respond to these concerns.

7. **Making Certain Records Available to Operating Personnel – 49 CFR 192.605**

PHMSA concluded that Neptune LNG's Appendix J failed to include detailed procedures for making construction records, maps, and operating history available to appropriate operating personnel and how such records are stored and retrieved.

Neptune LNG has made updates to Item 3 of the Normal Operating and Maintenance Procedures in Appendix J to respond to these concerns.

8. **Periodic Review of Normal Operation and Maintenance Work – 49 CFR 192.605**

PHMSA concluded that Neptune LNG's Appendix J failed to include detailed procedures for making construction records, maps, and operating history available to appropriate operating personnel and how such records are stored and retrieved.

Neptune LNG has made updates to Item 5 of the Normal Operating and Maintenance Procedures in Appendix J to respond to these concerns.

9. **Abnormal Operation Safety Procedures – 49 CFR 192.605**

PHMSA concluded that Neptune LNG's Appendix J failed to include detailed procedures to provide safety when operating design limits have been exceeded (abnormal operations) such as to check variations from normal operations after abnormal operations have ended and a process for notifying responsible operator personnel when notice of an abnormal condition is received.

Neptune LNG has made updates to Items 6 and 7 of the Abnormal Operating Procedures in Appendix J to respond to these concerns.

10. **Liaising With Appropriate First Responders and Public Officials – 49 CFR 192.615**

PHMSA concluded that Neptune LNG's Appendix J failed to include detailed procedures or a process regarding how it would maintain liaison with appropriate fire, police, and other public officials for emergency response.

Neptune LNG has made updates to Item 15 of the Emergency Procedures Appendix J to respond to these concerns.

11. **Review of Employee Adherence to Emergency Procedures – 49 CFR 192.615**

PHMSA concluded that Neptune LNG's Appendix J failed to include sufficient details regarding the review of employee activities to determine whether procedures were effectively followed in each emergency.

Neptune LNG has made updates to Item 14 of the Emergency Procedures in Appendix J to respond to these concerns.

12. **Training Operating Personnel of Emergency Procedures**

PHMSA concluded that Neptune LNG's Appendix J failed to include a process for training appropriate operating personnel to assure they are knowledgeable of the emergency procedures and verifying the effectiveness of the procedures.

Neptune LNG has made updates to Item 13 of the Emergency Procedures in Appendix J to respond to these concerns.

13. **Continuing Surveillance – 49 CFR 192.613**

PHMSA concluded that Neptune LNG's Appendix J failed to include a process for performing continuing surveillance of pipeline facilities, and also for reconditioning, phasing out, or reducing the MAOP in a pipeline segment that is determined to be in unsatisfactory condition, but no immediate hazard exists.

Neptune LNG has made updates to Items 1 and 2 of the Continuing Surveillance Procedures of Appendix J to respond to these concerns.

14. **Emergency Plans – 49 CFR 192.615**

PHMSA concluded that Neptune LNG's Appendix J failed to include a process for receiving, identifying, and classifying notices of events which need immediate response, a process for ensuring the availability of personnel, equipment, tools, and materials as needed at the scene of an emergency, to include a process for the emergency shutdown or pressure reduction in any section of pipeline system necessary to minimize the hazards to life of property, and a process for notifying appropriate officials of gas pipeline emergencies and coordinating with them both planned responses and actual responses during an emergency.

Neptune LNG has made updates to Items 2, 5 and 7 of the Emergency Procedures in Appendix J to respond to these concerns.

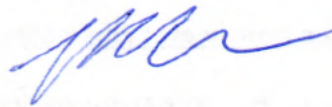
15. **Operator Qualification Program – 49 CFR 192.805**

PHMSA concluded that Neptune LNG's Appendix J did not identify all covered tasks and that Neptune must revise its OQ Plan to include details of the process by which its personnel are trained.

Neptune LNG has engaged an industry vendor to manage its Operator Qualification training and certification procedures and made corresponding updates to the Operator Qualification Section of Appendix J to respond to these concerns.

Neptune LNG is hopeful that these updates to Appendix J to its Deepwater Port Operations Manual reflect compliance with PHMSA's findings and remains available to make further revisions and updates should PHMSA conclude these amendments are not in each case sufficient to meet their expectations.

Respectfully submitted,



Keith Crane
Vice President – Neptune LNG LLC